

REMARKS

Claims 1-13 are pending in the present application. Applicants amended claims 1-2, 7-8, and 10-13 to clarify the claimed invention. Applicants refer to Fig. 8 and page 17, lines 14-17 in the specification for an exemplary embodiment of and support for the claim amendments. With reference to originally-filed claim 3, applicants amended claim 3 to correct a printing error in applicants' January 3, 2005 Response. No new matter has been added.

Claims 1, 2, 7, 8 and 13 stand rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 4,886,463 to Scott et al. Applicants amended claims 1, 2, 7, 8 and 13 in a good faith effort to clarify the claimed invention as distinguished from the cited reference. The Examiner's rejection is respectfully traversed.

Scott et al. describe a conventional connector assembly 60 with a female portion 40 and a male portion 50 that provides electromagnetic interference (EMI) shielding protection. (Please see the abstract, Figs. 3A-D, and their corresponding description in Scott et al.).

The Examiner apparently relied upon the male portion 50 described in Scott et al. to disclose the claimed "substantially box-shaped subrack having a back wiring board mounted with first connectors." It is unclear what the Examiner referred to as "multi-shell connectors" in Scott et al. to disclose the claimed "plurality of shell-type plug-in units." Nevertheless, applicants respectfully submit that the Examiner's rejection is improper because no interpretation of the elements described in Scott et al. can meet all of the features of the claimed invention.

The male portion 50 described in Scott et al. is merely a single connector having a trapezoidal socket 58 mounted on a back plate 52, the trapezoidal socket 58 having pins 56 that can be inserted into pin holders 46 in the female portion 40. The pins 56 are mechanically

connected to connect pins 66. Please see Fig. 3D and col. 6, lines 52-65 of Scott et al.

Therefore, it does not disclose a "subrack having a back wiring board mounted with first connectors," as recited in claims 1, 2, 7, and 8.

Even assuming, arguendo, that the male portion 50 (or the trapezoidal socket 58 thereof) can be interpreted as a "subrack," it only accommodates a single female portion 40 (or the trapezoidal socket means 48 thereof) to form a multi-shell connector 60. As such, the cited portions of Scott et al. would clearly fail to disclose "a plurality of shell-type plug-in units configured to be inserted into the subrack," as recited in claims 1, 2, 7 and 8. And even if it would be proper for the Examiner to apply pin connectors 46 described in Scott et al. to the claimed "plug-in units," a plurality of these pin connectors 46 are fixed to female portion 40. And, therefore, Scott et al. would fail to disclose,

"a flexible, electrically conductive seal member disposed between a lateral surface of the plug-in units that are inserted into the subrack and an interior portion of the subrack, said seal member being elastically deformed when a plug-in unit is inserted into the subrack and the second connector thereof is connected to the corresponding first connector so as to enclose both first and second connectors to provide a shield," as recited in claim 1. (Emphasis added)

Finally, the multi-shell connector 60 described in Scott et al. does not accommodate any electronic elements.

For the foregoing reasons, Scott et al., as applied by the Examiner, fails to disclose,

"a substantially box-shaped subrack having a back wiring board mounted with first connectors;

a plurality of shell-type plug-in units, accommodating electronic elements, configured to be inserted into the subrack so that a second connector of each of the plug-in units is connected to a corresponding one of the first connectors; and

a flexible, electrically conductive seal member disposed between a lateral surface of the plug-in units that are inserted into the subrack and an interior portion of the subrack, said seal member being elastically deformed when a plug-in unit is inserted into the subrack and the second

connector thereof is connected to the corresponding first connector so as to enclose both first and second connectors to provide a shield," as recited in claim 1. (Emphasis added)

Applicants, therefore, respectfully submit that claim 1 is patentable over Scott et al.

Since claims 2, 7, 8, and 13 all include limitations similar to those of claim 1 cited above, applicants further submit that these claims are also patentable over Scott et al. for at least the same reasons.

Claim 9 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Scott et al. Claim 9 depends from claim 1 and incorporates all limitations thereof. As such, applicants respectfully submit that claim 9 is patentable over Scott et al. for at least the above-stated reasons with respect to claim 1.

Claims 3-6 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Scott et al. in view of U.S. Patent No. 5,266,053 to Jamet et al.

The Examiner acknowledged that Scott et al. fail to disclose oblong-shaped openings in the frame member. The Examiner relied upon Jamet et al. as a combining reference to disclose this feature and to disclose a seal member with a flange. The seal having flanges 34 and 35 shown in Fig. 4 of Jamet et al. is made of a metal plate, which can only bend about the bending axes provided on two sides. Since the metal plate does not bend about the other remaining two sides, the seal of Jamet et al. cannot enclose the two connectors. In other words, the shield provided by the seal of Jamet et al. is incomplete. Jamet et al. explicitly require the seal to be resilient (see col. 3, line 61 to col. 4, line 5 of Jamet et al.) and do not describe or suggest that such flanges would be effective with any material other than a metal plate. Applicants, thus, respectfully submit that it would not be obvious to one skilled in the art to combine Jamet et al. with Scott et al. in the manner proposed by the Examiner to yield the claimed invention.

In addition, claims 3-6 depend from claim 2, and the Examiner relied upon Jamet et al. to specifically disclose additional elements recited in dependent claims 3-6. Applicants, therefore, respectfully submit that even assuming, arguendo, that it would be obvious to one skilled in the art to combine the references in the manner proposed by the Examiner, the combination would still fail to teach or suggest the elements of claim 1 cited above, limitations similar to which are included in claim 2.

For the foregoing reasons, claims 3-6 are patentable over Scott et al. and Jamet et al., individually and in combination.

Claim 10 stands rejected under 35 U.S.C. 103(a) as being unparentable over Scott et al. in view of U.S. Patent No. 4,743,080 to Siraty.

The Examiner acknowledged that Scott et al. do not teach a telecommunications apparatus having a seal member comprising a core spring member. Siraty was cited as a combining reference for disclosing a telecommunications apparatus having a seal member comprising a core spring member, a finger gasket that engages the core spring member, and an electrically conductive cloth wrapped around the finger gasket. The elongated means 310 (finger gasket) described in Siraty electrically connects the flat cables 250 and 260, and does not function as a shield. Additionally, the elongated means 310 are electrically insulated from one another as shown in Fig. 10 of Siraty. As such, the elongated means 310 would be short-circuited if a conductive cloth were wrapped around them. Therefore, it would not be obvious to one skilled in the art to combine Siraty with Scott et al. in the manner proposed by the Examiner to disclose a telecommunications apparatus having a finger gasket that engages the core spring member, and an electrically conductive cloth wrapped around the finger gasket.

In addition, claim 10 includes limitations similar to those of claim 1 cited above, and the Examiner relied upon Siraty to specifically disclose additional elements recited in claim 10. Applicants, therefore, respectfully submit that even assuming, arguendo, that it would be obvious to one skilled in the art to combine the references in the manner proposed by the Examiner, the combination would still fail to teach or suggest the elements of claim 1 cited above, limitations similar to which are included in claim 10.

For the foregoing reasons, claim 10 is patentable over Scott et al. and Siraty, individually and in combination.

Claim 11 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Scott et al. in view of Jamet et al. Claim 11 includes limitations similar to those of claim 3 discussed above, and is, therefore, patentable over the cited references for at least the same reasons.

Claim 12 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Scott et al. in view of U.S. Patent No. 6,526,212 to Mishriky et al.

As acknowledged by the Examiner, Scott et al. do not disclose an electrically conductive optical fiber seal member. The Examiner cited Mishriky et al. as a combining reference for disclosing an electrically conductive optical fiber seal member. Mishriky et al. merely describes an optical waveguide bulkhead feedthrough assembly having a feedthrough housing 11. Mishriky et al. do not disclose a feedthrough housing (applied to the claimed optical fiber seal member by the Examiner) that engages an opening formed in a metal casing of a shell-type plug-in unit to provide a shield with respect to the opening in the metal casing. Since the features of Mishriky et al. applied by the Examiner are not concerned with such shielding, applicants respectfully submit that it would not be obvious to one skilled in the art to combine Mishriky et al. with Scott et al. in the manner proposed by the Examiner to yield the claimed invention.

In addition, claim 12 includes limitations similar to those of claim 1 cited above, and the Examiner relied upon Mishriky et al. to specifically disclose additional elements recited in claim 12. Applicants, therefore, respectfully submit that even assuming, arguendo, that it would be obvious to one skilled in the art to combine the references in the manner proposed by the Examiner, the combination would still fail to teach or suggest the elements of claim 1 cited above, limitations similar to which are included in claim 12.

For the foregoing reasons, claim 12 is patentable over Scott et al. and Mishriky et al. individually and in combination.

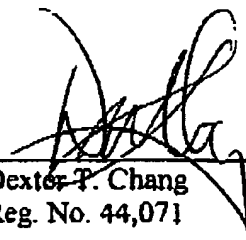
Statements appearing above in respect to the disclosures in the cited references represent the present opinions of the undersigned attorney and, in the event that the Examiner disagrees with any of such opinions, it is respectfully requested that the Examiner specifically indicate those portions of the respective reference providing the basis for a contrary view.

The Examiner has made of record, but not applied, an additional U.S. patent. Applicants appreciate the Examiner's implicit finding that this reference, whether considered alone or in combination with others, do not render the claims of the present application unpatentable.

In view of the remarks set forth above, this application is in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper, including any extension fees, may be charged to Deposit Account No. 50-1290.

Respectfully submitted,


Dexter T. Chang
Reg. No. 44,071

CUSTOMER NUMBER 026304
Telephone: (212) 940-6384
Fax: (212) 940-8986 or 8987
Docket No.: 100794-11694 (FUJI 18.488)
DTC:jc